

AMD13-154  
4/6/07

## Jessie White

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**From:** Jim Scholl [jim\_scholl@dot.state.ak.us]  
**Sent:** Monday, April 09, 2007 8:13 AM  
**To:** 'Jessie White'  
**Subject:** FW: STIP comments

**Attachments:** STIP07.doc; ATT00726.txt



STIP07.doc (33 KB)ATT00726.txt (127  
B)

Jessie, log this in and the attachment as a comment. Thanks!

-----Original Message-----

**From:** Lynn Canal Conservation [mailto:lcc11@aptalaska.net]  
**Sent:** Friday, April 06, 2007 4:31 PM  
**To:** DOT\_STIP@dot.state.ak.us  
**Cc:** governor@gov.state.ak.us; Senator\_Albert\_Kookesh@legis.state.ak.us;  
Rep\_Bill\_Thomas@legis.state.ak.us  
**Subject:** STIP comments

Please note Lynn Canal Conservation's concerns about including a Juneau/Katzehin road in the STIP

Lynn Canal Conservation, Inc.  
Box 964 • Haines, Alaska 99827

April 6, 2007

ADOT Statewide Planning Office – Division of Program Development

Sent via email: [DOT\\_STIP@dot.state.ak.us](mailto:DOT_STIP@dot.state.ak.us)  
Cc: [governor@gov.state.ak.us](mailto:governor@gov.state.ak.us)  
[Senator Albert Kookesh@legis.state.ak.us](mailto:Senator_Albert_Kookesh@legis.state.ak.us)  
[Rep Bill Thomas@legis.state.ak.us](mailto:Rep_Bill_Thomas@legis.state.ak.us)

Re: Comments on the 2006 – 2009 Statewide Transportation Improvement Program Draft

Lynn Canal Conservation, a Haines-based non-profit, supports safe, fiscally responsible, environmentally sound transportation infrastructure to benefit Alaskans. Because the federal Highway Trust Fund is expected to decline, and there will be less federal money available for Alaskan transportation projects, it is imperative to use the money we have wisely. Funding priorities should target fixing existing infrastructure in need of repair, particularly infrastructure that is part of the National Highway system, including the Alaska Marine Highway.

The three mega-projects proposed during the Murkowski administration are unnecessary and will cost far too much money to build and maintain. We oppose funding the Juneau/Katzehin road, and the Knik Arm and Gravina Bridges. Since a Katzehin road would impact our members, our comments focus on that project.

In December of 2006, the first on-the-ground investigation of the “extremely rugged terrain”<sup>1</sup> south of the Katzehin River occurred. Geologists from Golder Associates found 112 geological hazards (rockslide and landslide areas). In contrast, the Juneau Access Environmental Impact Statement (EIS) only identified 4 geological hazards<sup>2</sup>. Cost estimates for building the road were done prior to the Golder on-the-ground assessment. Mitigating 112 hazards will be far more expensive than mitigating 4. Using “a rough conservative estimate”, the EIS characterizes the geological hazards as occurring once per decade, and states that slides would reach the roadbed “somewhat less often.”<sup>3</sup> However, the Golder report identifies yearly debris on the roadbed from 11 separate sources and 3-dozen more areas that would need debris removal every 1 to 5 years. Additionally there are many more hazard areas that would require debris removal

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<sup>1</sup> Lynn Canal Highway, Phase I, Zone 4 Geotechnical Investigation, Final Report, Golder Associates, December 2006 (Golder report) at 27

<sup>2</sup> Juneau Access Improvements Final Environmental Impact Statement at 4-46

<sup>3</sup> Id.

less frequently.<sup>4</sup>

“Mega-boulders” are extremely large boulders ranging from 10 to 50 feet in diameter. “Because mega-boulders are so frequent and widespread in some areas, their appearance on geologic maps simply indicates their presence, not necessarily their number.”<sup>5</sup> Removing fields of mega-boulders “may present challenges to mechanical excavation” and “may complicate fill and compaction for road grading.”<sup>6</sup>

Preliminary geotechnical recommendations call for extensive use of retaining walls, more excavation and blasting than anticipated, and a possible need for tunnels and snow sheds. The EIS claimed snow sheds were too expensive and they were removed from the project.<sup>7</sup>

The Golder report found 37 hazards that were of sufficient volume to potentially “close the highway for several days to weeks.”<sup>8</sup> Due to the large number of unanticipated hazards and the sheer volume of material anticipated to fall onto the road, DOT cost estimates for the project need to be re-evaluated. Even with accurate information, DOT’s estimate for the Berner’s Bay section of a “pioneer” road was off by half. In light of the above, it is critical that a credible third party validate current cost estimates for this project before any funding is allocated.

Given the uncertainty of federal money and the likely underestimation of the costs of a Juneau/Katzehin road, it should be removed from the STIP until DOT identifies sufficient funding. Federal law requires that the STIP “shall include a project, or an identified phase of a project, only if full funding can reasonably be anticipated to be available for the project within the time period contemplated for completion of the project.”<sup>9</sup> Full funding for the Juneau/Katzehin road (and the two bridges) is highly unlikely in light of declining federal funding and the notoriety of past congressional earmarks for bridges and roads to nowhere.

Further, the Katzehin road does not comport with the Statewide Transportation Plan, which calls for a highway link between Juneau and Skagway. DOT cannot include a project in the STIP that is inconsistent with the Statewide Transportation Plan.<sup>10</sup> Therefore, DOT should remove the Juneau/Katzehin road from the STIP. We cannot support a Juneau/Skagway or a Juneau/Katzehin road

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<sup>4</sup> Golder, Tables 4-6

<sup>5</sup> Golder report at 17

<sup>6</sup> Id at 16

<sup>7</sup> EIS Appendix Y at 31

<sup>8</sup> Id at 26

<sup>9</sup> 23 U.S.C. 135(f)(2)(D)

<sup>10</sup> 23 U.S.C. 135(g)(4)(D)(I) stating that every project included in the STIP must be “consistent with the statewide transportation plan”; 23 C.F.R. 450.216(a)(3) stating that the STIP shall “[c]ontain only projects consistent with the statewide plan.”

and we continue to believe, along with a majority of residents in the Juneau, Haines, Skagway area, that the Alaska Marine Highway is the safest, most reliable, and most fiscally responsible transportation option.

Thank you for the opportunity to comment.

Sincerely,

Nancy Berland  
Issues Coordinator